

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Reallocation of Television Channels
60-69, the 746-806 MHz Band

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ET Docket No. 97-157

To: The Commission

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**COMMENTS OF
THE CALIFORNIA PUBLIC-SAFETY RADIO ASSOCIATION
A CHAPTER OF
THE ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS -
INTERNATIONAL**

The California Public-Safety Radio Association (CPRA), a chapter of the Association of Public-Safety Communications Officials - International (APCO), hereby offers Comment in the Commission's proceeding to reallocate spectrum in the 746-806 band, presently allocated to UHF television channels 60-69, including the allocation of 24 MHz for the exclusive use of public safety. APCO is filing separate comments in this proceeding, and CPRA fully supports those comments as well.

CPRA represents the regulatory interests of public safety providers from throughout ten Southern California counties, ranging in size from San Bernardino County, the largest county in the contiguous United States, to the City of San Fernando, with just 640 acres of incorporated area. The region also includes the counties of Los Angeles, Orange, San Diego, Imperial, Riverside, Kern,

Ventura, Santa Barbara, and San Luis Obispo, with a total population of more than 18 million (based on 1990 census data).

CPRA's more than 500 members represent agencies having jurisdiction over the Los Padres, Angeles, San Bernardino, Sequoia and Cleveland National Forests, as well the Channel Islands. On any given day, CPRA's membership can be found in such diverse environments as theme parks and resort destinations, international ports-of-call, major league stadiums and arenas, presidential libraries, or patrolling the highways, waterways, and railways that stretch from the Colorado River to the Pacific Ocean, and from the Sierra Nevada range to the United States border with Mexico.

But in spite of its idyllic and diverse setting, Southern California is not immune to crimes, disasters, and tragedies of every magnitude. Our public safety providers often spend their days and nights occupied with violent crimes, high-speed pursuits, officer-involved shootings, barricaded suspects, swimmers trapped in ocean riptides, forest and brush fires, evacuating canyon residents from the paths of massive mudslides, or coordinating the rescue of persons trapped inside collapsed buildings in the aftermath of great earthquakes. In each case, the key to success rests primarily with coordinated response and expedited resolution.

But it takes more than willpower, courage, organization, resources, management, cooperation, strength and determination to get these jobs done. It takes communications. It takes spectrum. It takes interoperability. It takes action; action by the President, the Congress, and the Federal Communications Commission; action that reflects an appreciation of the needs of the agencies where the nation's greatest channel loading exists; needs not adequately addressed by the Commission's

recent digital television channel assignments.

The current assignments do not satisfy the requirements of either Southern California's public safety community, or television broadcasters. By these comments we ask that the Commission reconsider the immediate needs of the Southern California public safety community and allocate 24 MHz of UHF-TV spectrum in such a manner that it is made available to all public safety agencies, nationwide, without exception.

By the Commission's action in MM Docket No. 87-268 and related DTV channel assignments, commercial broadcasters will have until the year 2006 - and perhaps beyond - before being required to return any of the spectrum loaned them for the transition. Southern California's public safety agencies should not be required to wait until that transition is complete before renewing hopes for spectrum relief. The need is immediate; much more so here than in most areas of the nation, and we ask the Commission to recognize and address this requirement as part of this proceeding.

CONCLUSION

The need for immediate spectrum relief to satisfy interoperability requirements is perhaps the greatest challenge presently facing public safety providers in Southern California. It is a challenge that must be shared by the Commission and its engineering staff and we ask that action not be deferred until after new commissioners are appointed and confirmed. For the Commission, this challenge represents a true opportunity to fulfill the will of Congress and the President in recognizing that satisfying the operational requirements of public safety is of the highest priority.

In the spirit of offering solutions and not just complaints, the California Public-Safety Radio Association requests that the Commission once again review the Southern California situation, and this time invite direct involvement and participation of all affected parties - Public Safety and Broadcast. CPRA would be pleased to offer to assist the Commission by either coordinating, or at a minimum, assist in coordinating such an undertaking

Respectfully submitted,

CALIFORNIA PUBLIC-SAFETY RADIO ASSOCIATION

A handwritten signature in black ink, appearing to read 'R. Blount' with a stylized flourish at the end.

Sgt. Ralph Blount
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